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Attorneys for Defendant DHL Express (USA), Inc.

UNITED STATES DISTRICT COURT

FOR THE CENTRAL DISTRICT OF CALIFORNIA

JORGE A. MEJIA, an individual,)	Case No. 2:15-cv-00890-GHK-JC
appearing on behalf of himself and)	
all others similarly situated,)	STIPULATION TO VACATE PRE-
)	TRIAL AND DISCOVERY DATES
Plaintiff,)	PENDING APPROVAL OF CLASS
)	ACTION SETTLEMENT
vs.)	
)	
DHL EXPRESS (USA), INC., an)	
Ohio corporation; and DOES 1-25,)	
)	
Defendants.)	
)	
)	

STIPULATION

IT IS HEREBY STIPULATED by and between Plaintiff Jorge A. Mejia ("Plaintiff") and Defendant DHL Express (USA), Inc. ("Defendant") (collectively, "the Parties"), by and through their undersigned counsel of record, as follows:

1. On March 3, 2016, representatives of the Parties attended a settlement mediation before a third-party neutral mediator experienced in the settlement of wage and hour class actions. During the mediation, the Parties reached an agreement in principle to settle this case in a class action settlement.
2. The Parties anticipate that it will take approximately thirty (30) to forty-five (45) days for the Parties to negotiate the specific terms of a class action settlement agreement and thereafter execute the agreement. The Parties further anticipate that, with the Court's permission, Plaintiff will file a motion for preliminary approval of the class action settlement to be heard by the Court on Monday, June 6, 2016, at 9:30 a.m.
3. On February 25, 2016, the Court granted in part Plaintiff's contested motion for class certification. The Parties believe that the proposed class action settlement has mooted the need to distribute a notice of the Court's February 25th class certification order, and, accordingly,

1 request the Court's permission to postpone any class notice until such
2 time as the Court authorizes notice of the proposed settlement to be
3 distributed.

4 NOW, THEREFORE, IT IS HEREBY STIPULATED between the
5 Parties, as follows:
6

- 7 1. The Parties respectfully request that the Court vacate all previously
8 scheduled pre-trial and discovery dates and deadlines so that Plaintiff
9 may file a motion for preliminary approval of the class action
10 settlement to be heard on Monday, June 6, 2016, at 9:30 a.m.
11
12 2. The Parties also respectfully request that the Court permit any class
13 notice to be postponed until such time as the Court authorizes notice
14 of the proposed settlement to be distributed.
15

16 DATED: March 10, 2016

LAW OFFICES OF GREGG A. FARLEY

17 By: /S/ Gregg A. Farley

18 Gregg A. Farley

19 Attorneys for Plaintiff Jorge A. Mejia,
20 appearing on behalf of himself and all others
21 similarly situated

22 DATED: March 10, 2016

SEYFARTH SHAW LLP

23 By: /S/ Richard B. Lapp

24 Richard B. Lapp

25 Attorneys for Defendant DHL Express (USA),
26 Inc.
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